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January 12, 2017

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: **Fixed Wireless Communications Coalition, Inc. Request for Modified Coordination Procedures
in Bands Shared Between the Fixed Service and the Fixed Satellite Service, RM-1178**

Dear Ms. Dortch:

PSSI Global Services, LLC respectfully submits this reply in opposition to the Petition for Rulemaking ("Petition") filed by Fixed Wireless Communications Coalition, Inc. ("FWCC") in the above-captioned proceeding.¹ PSSI Global Services, LLC fully supports the satellite industry's opposition to the rule changes proposed by the FWCC.² In particular, PSSI Global Services, LLC agrees with Intelsat that adopting FWCC's radical proposal to eliminate the Commission's long-standing and highly successful full-band, full-arc earth station licensing policy would critically harm the Fixed-Satellite Service ("FSS") customers that this flexible policy was designed to protect. As explained below, PSSI Global Services, LLC is such a customer. Accordingly, PSSI Global Services, LLC respectfully requests that the Commission deny or dismiss FWCC's Petition.

PSSI Global Services, LLC is a full service satellite transmission company combining 30 years of operational, project management, and engineering know-how with a fleet of over 45 C-Band and Ku-Band transportable uplink/downlink trucks and flyaway systems based throughout the United States. PSSI Global Services, LLC provides transportable uplink/downlink truck services to our customers for thousands of transmission event days per year, covering sports, entertainment, corporate, news and other coverage.

¹ Fixed Wireless Communications Coalition, Inc. Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service, RM-11778 (filed Oct. 11, 2016).

² See, e.g., Opposition of Intelsat License LLC, RM-1178 (filed Jan. 9, 2017); Petition to Dismiss or Deny of the Satellite Industry Association, RM-1178 (filed Jan. 9, 2017); Petition to Dismiss or Deny of SES Americom, Inc. (filed Jan. 9, 2017); Opposition of EchoStar Satellite Operating Corporation and Hughes Network Systems, LLC, RM-1178 (filed Jan. 9, 2017).

PSSI Global Services, LLC relies heavily on the availability of Occasional Use C-Band satellite transponder capacity to provide these services for our customers, which include all of the major broadcast and cable entities, among others. C-Band transportable uplink/downlink truck transmission and reception services are provided for such customers and services as NASCAR (all 38 weeks), WWE (all events weekly), The Golf Channel (all PGA, LPGA, and other golf tournaments), CBS (NFL Football, NCAA Basketball), ESPN (NCAA Football, NCAA Basketball, etc.), Fox (NCAA Football and the Super Bowl), ABC (Academy Awards, etc.), UFC (all events), HBO, Showtime, and Top Rank, etc. Some of these transportable uplink/downlink trucks have multiple antennae, and are often transmitting and receiving as many as (10) paths of video/audio per OU transponder at a time. We are therefore extremely dependent upon the availability and use of FSS C-Band satellite transponder capacity for virtually all of our service offerings.

Because occasional use capacity is pooled among numerous satellites, the Commission's existing full-band, full-arc earth station licensing policy is critically important for PSSI Global Services, LLC's occasional use, short-term video transmission/reception operations. In many, if not most, cases, the event venue at which PSSI Global Services, LLC will provide video transmission services is unknown until just a few days prior to the event. Thus, PSSI Global Services, LLC's transportable uplink fleet staff are often required to coordinate frequencies with spectrum coordinators on extremely short notice. The precise C-band frequencies and satellites on which PSSI Global Services, LLC operates for any given event depend on both the frequencies available at the particular location and the satellite capacity to which PSSI Global Services, LLC has access on an occasional use basis. FWCC's proposal would no longer allow for full-frequency, full-arc licenses and would, absent a waiver, require PSSI Global Services, LLC to file a license modification application or request for special temporary prior to transmitting on any frequency or to a satellite in any orbital location not explicitly provided in the applicable license. Because the very nature of occasional use, short-term video operations requires that FSS customers have the flexibility to coordinate their operational parameters on extremely short notice, the rigid licensing regime proposed by FWCC in its Petition would render these services all but impossible. Accordingly, PSSI Global Services, LLC respectfully requests that the Commission deny or dismiss FWCC's Petition.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Robert C. Lamb', is written over the word 'Sincerely,'.

Robert C. Lamb
CEO/Manager
PSSI Global Services, LLC

CERTIFICATE OF SERVICE

I, Robert C. Lamb, hereby certify that on this 12th day of January, 2017, I caused a true and correct copy of the foregoing to be served by first-class mail, postage prepaid, on:

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